

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS; STATE OF LOUISIANA,

Plaintiffs,

v.

The UNITED STATES OF AMERICA, et al.;

Defendants.

Civ. Action No. 6:21-cv-00016

STIPULATION AND [PROPOSED] ORDER

The parties in the above-captioned matter stipulate to the following scheduling order:

- 1) Plaintiffs shall file their amended complaint, and accompanying motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than October 22, 2021.
- 2) Defendants shall serve the full certified Administrative Record on Plaintiffs no later than November 4, 2021.
- 3) Defendants shall file their opposition to Plaintiffs' motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than November 12, 2021.

- 4) Plaintiffs shall file their reply memorandum to their motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than November 19, 2021.
- 5) Defendants' shall answer or otherwise respond to Plaintiffs' complaint or amended complaint no later than January 27, 2022.¹
- 6) The parties may agree to alter any of the above deadlines by agreement. To the extent any of the above deadlines are adjusted by agreement, one of the parties shall file a notice with the Court informing it of the changed deadline.

It is SO ORDERED.

October __, 2021

Drew B. Tipton
United States District Judge

¹ The parties previously stipulated for the responsive pleading date to be due January 27, 2021, but meant for the date to be January 27, 2022. Further, Plaintiffs stipulate to this responsive pleading deadline insofar as it would not have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

Date: October 25, 2021

Respectfully submitted.

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 25, 2021, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/ Adam D. Kirschner
ADAM D. KIRSCHNER